

1 Gustavo Ponce, Esq.  
2 Nevada Bar No. 15084  
3 Mona Amini, Esq.  
4 Nevada Bar No. 15381  
5 **KAZEROUNI LAW GROUP, APC**  
6 6787 W. Tropicana Ave., Suite 250  
7 Las Vegas, Nevada 89103  
8 Telephone: (800) 400-6808  
9 Facsimile: (800) 520-5523  
10 E-mail: [gustavo@kazlg.com](mailto:gustavo@kazlg.com)  
11 [mona@kazlg.com](mailto:mona@kazlg.com)

12 *Attorneys for Plaintiff,*  
13 *Carol Hart*

14  
15 **UNITED STATES DISTRICT COURT**  
16  
**DISTRICT OF NEVADA**

17  
18 **CAROL HART**, Individually and On  
19 Behalf of All Others Similarly Situated,

20  
21  
22  
23  
24  
25  
26  
27  
28  
Plaintiff,  
vs.  
**M&T BANK CORPORATION,**

Defendants.

Case No.: 2:24-cv-00921-MDC

REQUEST TO EXTEND TIME FOR  
DEFENDANT M&T BANK  
CORPORATION TO ANSWER THE  
INITIAL COMPLAINT

(First Request)

///

///

///



1 Plaintiff Carol Hart (“Plaintiff”) hereby files this unopposed Request for  
2 Extension of Time for Defendant M&T Bank Corporation (“M&T”) to Answer the  
3 initial complaint, and in support states as follows:

4 1. On May 16, 2024, Plaintiff filed the present lawsuit (Dkt. No. 1).

5 2. M&T was served with the Complaint on May 20, 2024.<sup>1</sup>

6 3. M&T’s responsive pleading was due on June 10, 2024, and on that same  
7 day, M&T requested an extension of time to respond to the Complaint which Plaintiff  
8 agreed to grant, through and including August 12, 2024.

9 4. Plaintiff and M&T are actively engaged in case-resolution negotiations.

10 5. Plaintiff does not oppose an extension of M&T’s time to Answer the  
11 Complaint so that the parties may devote their energies to resolving this matter. This  
12 request is filed consistent with an agreement from M&T requesting the Court for an  
13 extension of time to file its responsive pleading by sixty days, to August 12, 2024.

14 6. This request for an extension of time is not for delay.

15 7. This is M&T’s first extension of time and the requested extension does  
16 not prejudice the parties.

17 ///

18 ///

19 ///

20

21

22

23

24

25

26

27

---

28 <sup>1</sup> According to M&T’s records, service was effectuated on May 23, 2024, making its response due  
June 13, 2024.

8. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date on which M&T must answer or otherwise respond to Plaintiff's Complaint on or before August 12, 2024.

DATED this 12th day of June 2024.

# KAZEROUNI LAW GROUP, APC

By: /s/ *Gustavo Ponce* \_\_\_\_\_  
GUSTAVO PONCE, ESQ.  
MONA AMINI, ESQ.  
6940 S. CIMARRON RD., SUITE 210  
LAS VEGAS NEVADA 89113  
*Attorneys for Plaintiff*

## ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 05-18-24

**KAZEROUNI**  
LAW GROUP, APC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on June 12, 2024, the foregoing Notice was filed and served via CM/ECF to all parties appearing in this case.

# KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce  
GUSTAVO PONCE, ESQ.  
MONA AMINI, ESQ.  
6940 S. CIMARRON RD., SUITE 210  
LAS VEGAS NEVADA 89113  
*Attorneys for Plaintiff*

